

ORIGINAL

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DEPT. OF TRANSPORTATION
DOCKETS

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Department of Transportation

Docket No. FAA-99-5483 -8

400 Seventh Street SW., Room Plaza 401

Washington, DC 20590

To Whom It May Concern:

I have reviewed the proposed amendments to the parachuting regulation and feel that it is flawed. The flaw exists in the wording for the proposed changes in the radio communications section.

Current radio communication requirements for parachute operations state that radio communications be established between the aircraft and a FAA Air Traffic Control Facility or a FAA Flight Service Station (FSS) at least five (5) minutes before jumping activities begin (FAR section 105.14 (a)(1)(ii)). The proposed change requires that radio communications be established with the air traffic control facility having jurisdiction over the airspace in which the parachute operation is conducted. I feel that this is a step in the right direction for instating a consistent communication control system with parachute operations.

The recommended change in this NPRM sets the requirement for the communication between the pilot of an aircraft involved in parachute operations and the air traffic control facility in charge of the airspace. This change will restrict the information given to pilots who do not utilize communication in flight. One of the requirements for pilots during pre-flight activities is to concern themselves with all available information pertaining to the flight. This regulation includes requiring the pilot to be familiar with all active published and unpublished NOTAMS. The FSS should be notified of planned parachute jumps prior to flight. The stipulation published in the proposal requiring that pilot in command and the parachutists on that flight establish radio communications to receive information regarding air traffic activity in the vicinity of the parachute operation is also a flaw. This does not close the possibility of an aircraft taking off of an uncontrolled field and flying into an active parachute drop zone shortly after the parachuting activity begins. The proposed changes to Part 105 should reflect the interests of safety to everyone involved, included persons (aircraft) not participating in the parachute activity.

For those reasons, I can not support the proposed rules unless the section regulating radio communications is modified to reflect this. It is suggested that the communications section in this proposal to read:

“Prior to takeoff, the pilot in command or person responsible for the parachute activity shall contact the nearest Flight Service Station (FSS) for immediate release of a NOTAM. The following information shall be provided during this communication: estimated starting time of parachuting activity; location of “drop zone”; and the planned altitude of the drop. Prior to start of parachute activities, radio communications be established between the aircraft and the air traffic control facility having jurisdiction over the affected airspace at least 5 minutes before the parachute operation begins. The pilot of in command and the parachutists on that flight must have established radio communications to receive information regarding air traffic activity of the parachute operations.”

If this proposal is amended with these recommended communications requirement modifications, then I feel that most pilots would support his NPRM.

Respectfully,

A handwritten signature in black ink, appearing to read "Dennis Reiman", with a stylized flourish at the end.

Dennis Reiman